



March 19, 2008

RE: USDA/AMS proposal to add a 5% shatter allowance

To Whom It May Concern:

HMC Marketing is a grower-shipper of fresh table grapes and I am writing this letter in support of the USDA-AMS proposal to revise US Table Grape Standards for Grades as published in the Federal Register on February 26th, 2008; Vol. 73, No. 38.

After numerous industry meetings I believe the table grape industry has reached consensus that the method of scoring shatter at destination needed to be modified. An additional 5 percent allowance would coincide with the evolving marketing and packaging practices of our industry wherein the product is fully useable by both buyer and consumer. Studies done by the California Table Grape Commission, provided evidence that shatter ranging from 3 percent all the way up to 20 percent resulted in very little concern for the consumer.

While table grape shatter is a real occurrence, adoption of an additional five percent will only further resemble market conditions which allow for product use without compromising quality. Good healthy berries that are shattered are merchandisable. By definition and grading standard shatter represents grapes that are not attached to the stem. This new ruling would only apply to grapes in a consumer package, such as bags or clamshells. The proposed standard change only affects tolerance at destination and still recognizes factors of damage or decay. Product would be scored accordingly upon arrival.

I support this proposed common sense change for table grapes only when the product is marketed in consumer containers. I respectfully submit these comments in support of the proposed rule amending the U.S. Grade Standard for Table Grapes as it relates to shatter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Denise Young", is written over a light grey circular background.

Denise Young
HMC Marketing
Phone: 559-897-1009
Email: denisey@hmcmarketing.com

1 3 1 3 8 S . B E T H E L
Kingsburg, CA 93631
P H . (5 5 9) 8 9 7 - 1 0 0 9
F A X (5 5 9) 8 9 7 - 1 6 1 0
www.hmcmarketing.com